

CLYDE&CO

The Chrysler Building  
405 Lexington Avenue  
New York, New York 10174  
United States  
Telephone: +1 212 710 3900  
Facsimile: +1 212 710 3950  
[www.clydeco.com](http://www.clydeco.com)

**MEMO ENDORSED**

January 4, 2022

**By ECF**

Hon. Valerie E. Caproni  
United States District Judge  
United States District Court  
Southern District of New York  
40 Foley Square, Room 240  
New York, New York 10007

Re: *Allianz Global Corporate & Specialty SE v. M/V Maersk Idaho et al.*,  
1:21-cv-08931 (VEC)  
Our File No.: 10184613/001

Dear Judge Caproni,

We are attorneys for Allianz Global Corporate & Specialty SE a/s/o Boehringer Ingelheim International GmbH in the captioned action. We respectfully write in respect of Your Honor's Notice of Initial Pretrial Conference, dated November 11, 2021, scheduling the Initial Conference for January 14, 2022 and directing the parties to submit a joint letter and case management plan by January 6, 2022. (Dkt. 9, at 1-2) As the Defendants have agreed to waive service, they are not required to answer or move with respect to the Complaint until February 7, 2022. (Dkts. 10 and 11). Accordingly, Plaintiff respectfully requests an adjournment of the Initial Conference and the deadline to file the joint letter until a time after the Defendants have each answered the Complaint. As alternative dates for the Initial Conference, Plaintiff respectfully proposes the following Fridays: February 18, 2022, February 25, 2022, or March 11, 2022. Plaintiff has conferred with counsel for Defendant Kuehne + Nagel Inc. (the only other counsel who has appeared to date) who consents to this request.

The parties thank the Court for its attention to this matter.

CLYDE&CO

Hon. Valerie E. Caproni  
United States District Judge  
January 4, 2022  
Page 2

Respectfully,

Clyde & Co US LLP

By: /s/ John R. Keough

John R. Keough  
George G. Cornell  
The Chrysler Building  
405 Lexington Avenue, 16<sup>th</sup> Floor  
New York, New York 10174  
Tel: (212) 710-3900  
Fax: (212) 710-3950  
[john.keough@clydeco.us](mailto:john.keough@clydeco.us)  
[george.cornell@clydeco.us](mailto:george.cornell@clydeco.us)

*Attorneys for Allianz Global Corporate  
& Specialty SE a/s/o Boehringer  
Ingelheim International GmbH*

Application GRANTED. The initial pretrial conference, currently scheduled for January 14, 2022 at 3:00 P.M., is adjourned to **Friday, February 18, 2022 at 10:30 A.M.** Pre-conference submissions are due no later than **Thursday, February 10, 2022.** For the conference dial in information and a description of the pre-conference submission requirements, the parties should consult the Court's order at docket entry 9.

SO ORDERED.



Date: January 4, 2022

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE